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10 Attorneys for Defendant

*OTIS ELEVATOR COMPANY*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA, SOUTHERN DIVISION

13  
14 SEBASTIAN SYMEONIDES, an Individual,

15 Plaintiff,

16 vs.

17 TRUMP RUFFIN COMMERCIAL, LLC, a  
18 Foreign Limited-Liability Company d/b/a  
19 TRUMP INTERNATIONAL LAS VEGAS  
20 and TRUMP INTERNATIONAL HOTEL &  
21 TOWER LAS VEGAS; TRUMP RUFFIN  
22 TOWER I, LLC, a Foreign Limited-Liability  
23 Company; TRUMP INTERNATIONAL  
24 HOTELS MANAGEMENT, LLC, a Foreign  
25 Limited-Liability Company; OTIS  
26 ELEVATOR CORPORATION, a Foreign  
27 Corporation; DOES I through X, inclusive;  
28 and ROE BUSINESS ENTITIES I through  
XX, inclusive,

Defendants.

Case No. 2:23-cv-00854-JAD-VCF

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY PLAN FOR  
REBUTTAL EXPERT DISCLOSURES  
FOR ECONOMIC EXPERTS AND  
SCHEDULING ORDER**

**(Third Request)**

COMES NOW, Plaintiff SEBASTIAN SYMEONIDES, by and through his attorneys of

Case No. 2:23-cv-00854-JAD-VCF

STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN FOR INITIAL EXPERT DISCOVERY AND  
REBUTTAL FOR ECONOMIC EXPERTS AND SCHEDULING ORDER

record, the law firm CHRISTIANSEN TRIAL LAWYERS, Defendant TRUMP RUFFIN TOWER I, LLC, erroneously sued herein as TRUMP RUFFIN COMMERCIAL, LLC, d/b/a TRUMP INTERNATIONAL LAS VEGAS and TRUMP INTERNATIONAL HOTEL & TOWER LAS VEGAS; and TRUMP INTERNATIONAL HOTELS MANAGEMENT, LLC by and through its counsel of record, the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP and Defendant OTIS ELEVATOR COMPANY by and through its counsel of record, the law firms ROGERS, MASTRANGELO, CARVALHO, AND MITCHELL and TUCKER ELLIS LLP, and hereby request the Rebuttal Expert Disclosures in the previously filed Order [Doc 29] be extended for Plaintiff and Defendants' economic experts by seven (7) days up to and including June 3, 2024 pursuant to FRCP 29 and LR 26.4, as follows:

**A. EXPERT DISCOVERY TO BE COMPLETED AND REASONS FOR  
EXTENSION OF DISCOVERY**

The current deadline for Rebuttal Expert Disclosures is May 27, 2024. [Doc. 29] The parties have been working diligently to complete fact and expert discovery. The parties served Initial Expert Disclosures on April 25, 2024, including the disclosure of Plaintiff's economic expert Dr. Robert Cook and Defendants' economic expert Laura Dolan. The parties will be serving Rebuttal Expert Disclosures on May 27, 2024. However, due to outstanding written discovery requests, an exception is required for economic experts.

Plaintiff Sebastian Symeonides alleges serious injuries and other related damages as a result of an alleged elevator drop and entrapment on February 14, 2022 at Trump International Hotel. Plaintiff's estimated net present value lost earning capacity is \$1,927,393. Plaintiff is employed as President and CEO of VABODE, Inc., which provides mental health services to individuals who have a mental health diagnosis and VABODE is managed through a holding company SIMCO.

On April 16, 2024, Defendant Otis served a Third Set of Requests for Production of Documents requesting additional financial documents related to Plaintiff's economic loss claims, including recent profit and loss statements, Schedule K-1, and any documents evidencing out of pocket costs incurred to hire employees. The parties have agreed to an extension of time for Plaintiff to respond

to these requests on or before May 23, 2024. In order for both parties' economic experts to review necessary financial documents, the parties agreed that the Rebuttal Expert Disclosure for Dr. Cook and Ms. Dolan be extended up to and including June 3, 2024.

The parties agree, pursuant to Local Rule 6-1, that good cause exists for the requested extension. The extension will not impede the current deadlines previously established in this matter, nor will it prejudice any party.

In light of the circumstances and to ensure a comprehensive and equitable discovery process, the parties respectfully request an extension of time until June 3, 2024, for the Rebuttal Expert Disclosures for Dr. Cook and Ms. Dolan. All other deadlines remain the same.

**C. PROPOSED PLAN FOR COMPLETING DISCOVERY FOR VOCATIONAL EXPERT WITNESSES**

Event	Current Deadline	Proposed Deadline
Rebuttal Expert Disclosure for Economic Experts Dr. Robert Cook and Laura Dolan	May 27, 2024	June 3, 2024

**D. THE CURRENT TRIAL DATE**

This matter has not been scheduled for trial.

**E. NUMBER OF REQUESTS FOR EXTENSION**

This is the third request to extend discovery deadlines.

Dated this 21<sup>st</sup> day of May, 2024

CHRISTIANSSEN TRIAL LAWYERS

/s/ Keely P. Chippoletti

PETER CHRISTIANSEN, ESQ.  
Nevada Bar No. 5254  
R. TODD TERRY, ESQ.  
Nevada Bar No. 6519

Dated this 21<sup>st</sup> day of May, 2024

LEWIS BRISBOIS BISGAARD &  
SMITH LLP

/s/ David B. Avakian

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*Trump Ruffin Tower I, Trump International*  
*Las Vegas and Trump International Hotel*  
*& Tower Las Vegas and Trump International*  
*Hotels Management, LLC*

7 Dated this 21st day of May, 2024

Dated this 21st day of May, 2024

8 ROGERS, MASTRANGELO, CARVALHO  
9 & MITCHELL

TUCKER ELLIS LLP

10  
11 /s/ Rebecca L. Mastrangelo

/s/ Su-Lyn Combs

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*Attorneys for Defendant Otis Elevator*  
*Company*

18 IT IS SO ORDERED For good cause  
19 show, the stipulation is APPROVED.

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United States Magistrate Judge

DATED 5-22-24

**CERTIFICATE OF SERVICE**

I certify that on **May 21, 2024**, the foregoing **STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN FOR INITIAL EXPERT DISCOVERY AND REBUTTAL FOR ECONOMIC EXPERTS AND SCHEDULING ORDER** was filed via the Court's CM/ECF system, which generated a notice of electronic filing with links to true and correct copies of the foregoing document for service, and further that this document and all attachments were transmitted via U.S. Mail and email upon the following counsel of record:

<p>Peter S. Christiansen, Esq. R. Todd Terry, Esq. Kendele Leascher Works, Esq. Whitney J. Barrett, Esq. Keely P. Chippoletti, Esq. CHRISTIANSEN TRIAL LAWYERS 710 S. 7th Street, Suite B Las Vegas, Nevada 89101 Email: <a href="mailto:keely@christiansenlaw.com">keely@christiansenlaw.com</a></p> <p><i>Attorneys for Plaintiff</i></p>	<p>David B. Avakian, Esq. LEWIS BRISBOIS BISGAARD &amp; SMITH LLP 6385 South Rainbow Blvd., Suite 600 Las Vegas, NV 89118 Email: <a href="mailto:David.Avakian@lewisbrisbois.com">David.Avakian@lewisbrisbois.com</a></p> <p><i>Attorneys for Defendants Trump Ruffin Commercial, LLC d/b/a Trump International Las Vegas and Trump International Hotel &amp; Tower Las Vegas; Trump Ruffin Tower I, LLC; Trump International Hotels Management, LLC</i></p>
<p>REBECCA L. MASTRANGELO, ESQ. Nevada Bar No. 5417 ROGERS, MASTRANGELO, CARVALHO &amp; MITCHELL 700 South Third Street Las Vegas, Nevada 89101 Phone (702) 383-3400 Fax (702) 384-1460 Email: <a href="mailto:rmastrangelo@rmcmlaw.com">rmastrangelo@rmcmlaw.com</a></p> <p><i>Attorneys for Defendant Otis Elevator Company</i></p>	

/s/ Stella S. Villegas  
Stella S. Villegas